

**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
BUTTE COUNTY
DEPARTMENT OF EMPLOYMENT AND SOCIAL SERVICES
Conducted
April 29 – May 1, 2008**

**California Department of Social Services
Human Rights and Community Services Division
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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Butte County Department of Employment and Social Services (DESS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on April 29, 2008 – May 1, 2008 with Diana Higgins, Civil Rights Coordinator. An exit interview was held on May 1, 2008 to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Butte Community Employment Center	2445 Carmichael Dr. Chico, CA	Food Stamps, CalWORKS, Children Services, Adult Services, IHSS	Spanish, Hmong
Butte County Department of Employment and Social Services	78 Table Mountain Blvd. Oroville, CA	Employment Services	Spanish, Hmong

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007/08 Annual Civil Rights Plan submitted by the County DESS.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Intake/Continuing Workers	6	4
Children Social Workers	3	2
IHSS/APS Social Workers	3	1
Lobby Receptionist	3	2
Employment Worker	2	1
Total	17	10

Program Manager Surveys

Number of surveys distributed	7
Number of surveys received	7

Reviewed Case Files

Totals	82
English speakers' case files reviewed	30
Non-English or limited-English speakers' case files reviewed	52
Languages of clients' cases	Spanish, Hmong, Vietnamese, and ASL

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team's findings, including appropriate comparisons. This format is to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS Division 21 regulations. This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Mail-in applications are accepted for eligibility determination in some programs. * Refer to note under Recommendations below.
Does the county have extended hours to accommodate clients?	X			Offices are open from 7:30 a.m. -5:00 p.m. These are considered "extended hours" to accommodate DESS clientele who are employed and may need an early appt. If necessary and on a case-by-case basis DESS would make every attempt to meet the needs of an applicant/recipient outside of normal business hours.
Can applicants access services when they cannot go to the office?	X			Yes, the DESS has assigned "home visit" workers in the Eligibility Program. Field visits are made routinely by all the services programs.

Does the county ensure the awareness of available services for individuals in remote areas?	X			The DESS has a proactive approach for outreach that includes: internet web-site; job fairs; newspaper articles; phone book, and speaking engagements.
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Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			Workers are required to review the Pub 13 with the client. It is also distributed in the intake packets offered to all clients as well as at recertification for eligibility programs.
Is the pamphlet distributed and explained to each client at intake and re-certification?	X			
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?	X			The Pub 13 was available in all the required languages.
Was the Pub 13 available in large print, audiocassette and Braille?	X			The Pub 13 in large print, audiocassette and Braille is kept at the Reception counter.
Were the current versions of the required posters present in the lobbies?	X			All required posters were present in lobbies.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All staff interviewed were aware of location of required posters and where the Civil Rights Coordinator information is posted.

Signage, posters, pamphlets	Yes	No	Sometimes	Comments
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?		X		There was instructional signage for drop box, office hours, and a No Weapons sign, which are not in threshold languages; Spanish and Hmong are the threshold languages at the Chico office.

B. Corrective Actions

Informational Element	Corrective Action Required
Directional signage	The Butte County Department of Employment and Social Services <u>shall ensure</u> that instructional <u>and directional</u> signs are <u>posted in waiting areas and other places</u> that are <u>frequented by</u> clients and that where such areas are frequented by <u>a substantial number of non-English-speaking</u> clients, such signage <u>shall be translated into appropriate languages.</u> <u>Div. 21-107.212 and .24</u>

C. Recommendation/Note

* All County Letter (ACL) 08-32 issued on July 14, 2008, Food Stamp Waiver of Face-to-Face Interview and Non-Assistance Food Stamp Household Recertification Form, FS 27. These instructions contained in this ACL and regulations are effective August 1, 2008.

The most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and structural communication barriers must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 2445 Carmichael Drive, Chico **(Main Entrance)**

Facility Element	Findings	Corrective Action
Parking	There are two parking entrances to the Chico office. One of the entrances does not have the required "unauthorized parking" signage.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense."

		Towed vehicles may be reclaimed at _____ or by telephoning _____.” (CA T24 1129B.5) p. 133
Men’s Restroom	<p>Force to open door is excessive at 9 lbs.</p> <p>The wrapping on the pipes under the sinks is coming loose and needs to be re-wrapped.</p> <p>Toilet Protector is too high at 44”. (operable part needs to be at 40”)</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b)</p> <p>Hot water and drain pipes must be insulated and covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40”. (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269</p>
Women’s Restroom	<p>Force to open door is excessive 6 lbs.</p> <p>The wrapping on the pipes under the sinks is coming loose and needs to be re-wrapped.</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b)</p> <p>Hot water and drain pipes must be insulated and covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p>

B. Recommendation

Note: It was brought to the reviewer’s attention that one parking entrance at 2445 Carmichael, Chico is for another business parking and is not for the Butte County Department Employment and Social Services. It is recommended that a sign designating that this entrance is for parking for the other business or an “unauthorized sign” be placed.

Facility Location: 2445 Carmichael Drive, Chico (**Children's Entrance**)

Facility Element	Findings	Corrective Action
Parking – Van access aisle	<p>Van-Accessible space is too short at 18' x 6' 9".</p> <p>Accessible signage - No directional signage to entrance.</p>	<p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p. 135</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p>
Lobby	Force to open door is excessive at 9 lbs.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b))
Unisex Restroom	<p>Force to open door is excessive 7 lbs.</p> <p>Toilet Protector is too high at 44".</p>	<p>Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b))</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269</p>

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 78 Table Mountain Blvd., Oroville (**Main Entrance**)

Facility Element	Findings	Corrective Action
Parking	There is no “unauthorized parking” signage at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17” by 22” min. in size with lettering 1” min. high, stating: “Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner’s expense. Towed vehicles may be reclaimed at _____ or by telephoning _____.” (CA T24 1129B.5) p. 133
Main Doors	These doors are automatic. However, on the day of the review the automatic function was not operative. Force to open these doors is excessive at 20 lbs.	Maintenance is required to repair automatic doors. Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b)
Men’s Restroom	Force to open door is excessive 10 lbs. Toilet Protector is too high 47”.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b) If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, <u>at a maximum height of 40”</u> . (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
Women’s Restroom	Force to open door is excessive.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b)

B. Recommendation

None

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

Facility Location: 78 Table Mountain Blvd., Oroville **(Children's Entrance)**

Facility Element	Findings	Corrective Action
Parking	None – Excellent!	None required
Main Entrance	Force to open door is excessive.	Force to open doors, exterior and interior is 5 pounds maximum (CA T24 1133B.2.5, ADA 4.13.11 (2) (a) &(b)

B. Recommendation

None

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Clients learn of bilingual services upon entering the lobby where signage is posted in English, Spanish and Hmong.
Does the county use a primary language form?	X			Form BU526
Does the client self-declare on this form?	X			Client completes the form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Clients are provided with bilingual services immediately after selecting their preference on the BU526 or if they make verbal request.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			All staff is trained to follow the procedure for accessing an interpreter who speaks the client's preferred language. The worker contacts the Interpreter Supervisor for assistance if needed.
Is there a delay in providing services?		X		If a DESS interpreter is not available, a worker may access an interpreter from the Interpreter Language Line or from the Community.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			A Language Line Interpreter Services is also available if an interpreter can not be secured.

Question	Yes	No	Some-times	Comments
Are county interpreters determined to be competent?	X			There is a testing process which involves written and oral elements.
Does the county have adequate interpreter services?	X			A system is in place to access interpreters. Recruitment efforts were made for Hmong and Spanish speaking workers.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			Only if it is the clients preference. Workers are trained to secure a department interpreter by contacting the Interpreter Supervisor.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			Staff explains to client there could be a miscommunication using their own interpreter.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Translated forms are used and available in languages other than English in the mail room. Forms and notices are also accessible on the County Intranet.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			Butte County Department of Employment and Social Services has automated software programs that provide translation to other languages.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	X			TDD phones equipment; sign language interpretation, written material; ADA directional signs are provided for persons with impaired hearing. Braille text and audio taped Pub 13.

Question	Yes	No	Some-times	Comments
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			The buildings and the parking lots are ADA compliant. Clients may opt to be screened or tested for learning disabilities. Staff can read or complete forms for clients if needed.
Does the county offer screening for learning disabilities?	X			The county has a screening in-place process, and clients may opt to be screened or tested for learning disabilities.
Is there an established process for offering screening?	X			DESS policy ensures that administrative practices and services to our clients do not deny non-English speaking persons and individual with disabilities equal access to, and participation in, the available programs and activities.
Is the client identified as having a learning disability referred for evaluation?	X			Clients may opt to be screened or tested for learning disabilities. Clients are referred for appropriate assistance as needed.

B. Corrective Actions

No corrective action required.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Ethnic origin documentation	Children's Fact Sheet, SS 8583, SOC 341	BU526, SOC 295, SOC 341	Form BU526	SAWS1

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Primary language documentation	SOC 341, BU526, ERR	Form BU526	Form BU526	Form BU526
Method of providing bilingual services and documentation.	Noted in most cases with BU526, and/or narrative.	Noted in most cases with BU526, and/or narrative.	Noted in most cases with BU526, and/or narrative.	Noted in most cases with BU526, and/or narrative.
Client provided own interpreter	Item not found in cases reviewed.	Noted in case narrative.	Item not found in cases reviewed.	Item not found in cases reviewed.
Method to inform client of potential problem using own interpreter	Item not found in cases reviewed.	APS Face Sheet a	Item not found in cases reviewed.	Item not found in cases reviewed.
Release of information to Interpreter	Item not found in cases reviewed.	In adult programs, the case narrative notes are very detailed and	Item not found in cases reviewed.	Item not found in cases reviewed.
Individual's acceptance or refusal of written material offered in primary language	BU526	BU526	BU526	BU526
Documentation of minor used as interpreter	Item not found in cases reviewed.	Item not found in cases reviewed.	Item not found in cases reviewed.	Item not found in cases reviewed.
Documentation of circumstances for using minor interpreter temporarily	Item not found in cases reviewed.	Item not found in cases reviewed.	Item not found in cases reviewed.	Item not found in cases reviewed.
Translated notice of actions (NOA) contain translated inserts	Yes	Yes	Yes	Yes
Method of identifying client's disability	Noted on Statement of Facts Form	Statement of Facts/SOC 293/Face Sheet	Statement of Facts/SAWS2/BU526	Statement of Facts/SAWS2/BU526

Documented Item	Children's Services	Adult Programs	CalWORKs	Non-Assisted Food Stamps
Method of documenting a client's request for auxiliary aids and services	Item not found in cases reviewed.	Item not found in cases reviewed.	Item not found in cases reviewed.	Case narrative

B. Corrective Actions

Areas of Action	Corrective Action
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

C. Recommendation

None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Training is offered throughout the year in e-learning and group settings.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			Workers are trained to explain to the client that they have specific civil rights and the information is contained in the Pub 13.
Does the county provide employees Cultural Awareness Training?	X			Cultural diversity training is provided by the county.

Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			Training is provided during the core training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			Staff interviewed was very aware of the cultural groups in their service area.

B. Corrective Actions

None required.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			All staff interviewed was knowledgeable of the differences between complaints.
Did the employees know who the Civil Rights Coordinator is?	X			All staff knows the CRC by name.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			All staff were aware of the location of the Civil Rights posters.

Interview and review areas	Yes	No	Some-times	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			Complaint log was up-to-date.

B. Corrective Action

None required

IX. CONCLUSION

The CDSS would like to thank Butte County Department of Employment and Social Services for the tremendous cooperation and hospitality provided to the reviewers. Staff was very friendly and helpful during the on-site portion of the review, and the interviewed staff was open, very service-oriented and a pleasure to interview. Particular thanks to Diana Higgins, Civil Rights Coordinator, for her assistance in organizing and coordinating the review.

There is clear evidence of an active civil rights program presence and a commitment to ensure appropriate delivery of service to all applicants/recipients served by Butte County Department of Employment and Social Services.

Butte County Department of Employment and Social Services was found to be in substantial compliance with CDSS Manual of Policies and Procedures Division 21 Regulations, and other applicable state and federal civil rights laws.

Butte County Department of Employment and Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date on the cover letter. The plan must include a schedule by which all actions will be taken to correct the deficiencies.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff are available to provide technical assistance as requested.